

Victor J. Mastromarco, Jr. (Mich Bar No P34564) Hearing Date: June 19, 2006
MASTROMARCO & JAHN, P.C. Time: 10:00 a.m.
Counsel to Cindy Palmer
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Chapter 11
Case No. 05-44481 (RDD)
(Jointly Administered)

Debtors.

**CINDY PALMER PERSONAL REPRESENTATIVE OF THE ESTATE OF
MICHAEL PALMER OBJECTION TO DEBTOR'S CORRECTED
OBJECTION TO MOTION OF CINDY PALMER, PERSONAL
REPRESENTATIVE OF ESTATE OF MICHAEL PALMER, DECEASED,
FOR RELIEF FROM AUTOMATIC STAY**

Now comes the Movant, Cindy Palmer, as Personal Representative of the Estate of Michael Palmer, by and through her attorneys, who hereby files this objection to the "Corrected Objection" which has been filed by the debtor for the reasons as set forth more fully below:

1.

Upon information and belief, on Thursday, June 15, 2006, the Debtor filed a "Corrected Objection" to Movant's motion to set aside the bankruptcy stay, which was received by Movant's Counsel on Friday, June 16, 2006.

2.

Upon information and belief, the debtor had previously filed an objection on Friday, June 9, 2006, which Movant's Counsel received on Monday, June 12, 2006.

3.

The hearing on Movant's motion is currently set for Monday, June 19, 2006.

4.

That the last minute and untimely filing of the "Corrected Objection" by the debtor has made it impossible for the Movant to respond to the "corrections" by the current hearing date.

5.

Furthermore, the late filing violates the Court's Scheduling Order that requires the filing of objections at least 7 days before the hearing.

6.

The Movant hereby requests that this Honorable Court strike the untimely "Corrected Objection".

WHEREFORE, the Movant respectfully request that the Court strike the "Corrected Objection".

Dated: June 16, 2006

Respectfully submitted,

MASTROMARCO & JAHN, P.C.

s/ Victor J. Mastromarco, Jr.

Victor J. Mastromarco, Jr. (P34564)

Attorney for Movant

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